

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL FINANCE CORPORATION,  
not in its individual capacity but solely as the  
Trustee for the IFC-Netherlands Carbon Facility  
2121 Pennsylvania Avenue, N.W.,  
Washington, DC 20433,

*Plaintiff,*

-against-

KORAT WASTE TO ENERGY CO. LTD.,  
(a/k/a KHORAT WASTE TO ENERGY CO.)  
571/11 Moo 3, Suranaree Industrial Zone,  
Tambon NongBausala, Amphur Muang District,  
Nakorn Ratchasima, 30000, Thailand,

*Defendant.*

07 Civ. 5451 (SHS) (ECF)

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

*To the above-named Plaintiff:*

PLEASE TAKE NOTICE THAT, pursuant to Rule 1.3(c) of the Local  
Rules of the United States District Courts for the Southern and Eastern Districts of New  
York, Elkan Abramowitz, a member in good standing of the bar of this Court, hereby  
moves for an Order allowing the admission *pro hac vice* of:

Anthony F. King  
Wallace King Domike & Reiskin, PLLC  
1050 Thomas Jefferson St., NW  
Washington, DC 20007  
Phone: (202) 204-1000  
Fax: (202) 204-1001

Mr. King is a member in good standing of the bars of the State of  
Michigan and of the District of Columbia. There are no pending disciplinary proceedings

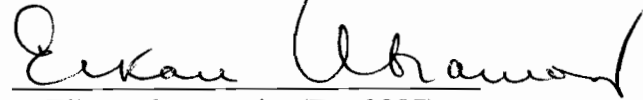
620169 #2-  
7-9-07

against him.

Dated: July 7, 2007  
New York, New York

MORVILLO, ABRAMOWITZ, GRAND,  
IASON, ANELLO & BOHRER, P.C.

By:

A handwritten signature in black ink, appearing to read 'Elkan Abramowitz', written over a horizontal line.

Elkan Abramowitz (EA-3987)

565 Fifth Avenue  
New York, New York 10017  
Phone: (212) 856-9600  
Fax: (212) 856-9494

*Attorneys for Defendant*

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*Defendant.*

07 Civ. 5451 (SHS) (ECF)

**AFFIDAVIT OF  
ELKAN ABRAMOWITZ  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

STATE OF NEW YORK     )  
                                  )     ss.:  
COUNTY OF NEW YORK    )

ELKAN ABRAMOWITZ, being duly sworn, deposes and says:

1. I am a principal of the firm of Morvillo, Abramowitz, Grand, Iason, Anello & Bohrer, P.C., counsel for defendant in the above-captioned action. I am familiar with the proceedings in this case. I make this statement in support of defendant's motion to admit Anthony F. King as counsel *pro hac vice* to represent defendant in this action.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1964. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.


3. Mr. King is a member of the firm of Wallace King Domike & Reiskin, PLLC, in Washington, DC. He is a member in good standing of the bars of the State of Michigan and the District of Columbia. Copies of Certificates of Good Standing from the State of Michigan and the District of Columbia, issued within 30 days of the date hereof, are attached hereto as exhibits A and B, respectively.

4. I am familiar with Mr. King's reputation and I am informed and believe that Mr. King is a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Accordingly, I am pleased to move the admission of Anthony F. King, *pro hac vice*.

6. I respectfully submit a proposed Order granting the admission of Anthony F. King, *pro hac vice*, which is attached hereto as Exhibit C.

WHEREFORE it is respectfully requested that the motion to admit Anthony F. King, *pro hac vice*, to represent defendant in the above-captioned matter, be granted.

  
ELKAN ABRAMOWITZ

Sworn to before me this  
9<sup>th</sup> day of July, 2007

  
Notary Public

**VALERIE J. COHEN**  
**NOTARY PUBLIC, State of New York**  
**No. 01CO4997886**  
**Qualified in Suffolk County**  
**Commission Expires: June 15, 2010**



# State Bar of Michigan

## Certificate of Good Standing



This certifies that Anthony F. King, P42981 of Washington, DC is an active member of the State Bar of Michigan in good standing. He was admitted to practice in Michigan on November 22, 1989 in Wayne County and became a member of the State Bar of Michigan on November 22, 1989.

Janet K. Welch  
Executive Director  
July 02, 2007





**District of Columbia Court of Appeals**  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

ANTHONY FRAZIER KING

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was on the 6<sup>TH</sup> day of MARCH, 1992  
duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 5, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

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*Defendant.*

07 Civ. 5451 (SHS) (ECF)

**ORDER FOR ADMISSION  
OF COUNSEL PRO HAC VICE**

Upon the motion of Elkan Abramowitz, attorney for defendant, and said  
sponsor attorney's affidavit in support,

IT IS HEREBY ORDERED that:

Anthony F. King  
Wallace King Domike & Reiskin, PLLC  
1050 Thomas Jefferson St., NW  
Washington, DC 20007  
Phone: (202) 204-1000  
Fax: (202) 204-1001  
aking@wallaceking.com

is admitted to practice *pro hac vice* as counsel for defendant Korat Waste to Energy Co.  
Ltd. in the above-captioned case in the United States District Court for the Southern  
District of New York.

All attorneys appearing before this Court are subject to the Local Rules of  
this Court, including the Rules governing discipline of attorneys.

Counsel shall apply immediately for a password for the Court's Electronic Case Filing system and shall forward the *pro hac vice* fee to the Clerk of the Court.

IT IS SO ORDERED this \_\_\_\_ day of July, 2007

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Sidney H. Stein, U.S.D.J.



**CERTIFICATE OF SERVICE**

I hereby certify that, on July 9, 2007, I caused a copy of defendant's foregoing Notice of Motion to Admit Counsel Pro Hac Vice, with the Supporting Affidavit of Elkan Abramowitz and the exhibits thereto, to be sent via e-mail and U.S. Mail first class, postage-prepaid to plaintiff's counsel of record:

Francis A. Vasquez, Jr., Esq.  
WHITE & CASE, LLP  
701 Thirteenth Street, N.W.  
Washington, DC 20005  
fvasquez@whitecase.com

Dated: New York, New York  
July 9, 2007

A handwritten signature in black ink, appearing to read 'T. Keane', written over a horizontal line.

THOMAS M. KEANE